

4. [Fill in if applicable] Plaintiff is filling this case in a representative capacity as the _____ of _____, having been duly appointed as the _____ by the _____ Court of _____. (Cross out sentence below if not applicable.)

Copies of the Letters of Administration/Letters Testamentary for a wrongful death claim are annexed hereto if such Letters are required for the commencement of such claim by the Probate, Surrogate or other appropriate court of the jurisdiction of the decedent.

5. Plaintiff, Todd Scott, is a resident and citizen of Texas and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband/decedent.

6. {Fill in if applicable} Plaintiff's spouse, _____, is a resident and citizen of _____, and claims damages as a result of loss of consortium proximately caused proximately caused by the harm suffered by her Plaintiff husband/decedent.

7. On information and belief, the Plaintiff (or decedent) sustained repetitive, traumatic sub-concussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff suffers (or decedent suffered) from symptoms of brain injury caused by repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff (or decedent) sustained during NFL games and/or practices. On information and belief, the Plaintiff's (or decedent's) symptoms arise from injuries that are latent and have developed and continue to develop over time.

8. [Fill in if applicable] The original complaint by Plaintiff(s) in this matter was filed in The District Court of Brazoria County, TX. If the case is remanded, it should be remanded to The District Court of Brazoria County.

9. Plaintiff claims damages as a result of [check all that apply]:

- ☒ Injury to Herself/Himself
- ☐ Injury to the Person Represented
- ☐ Wrongful Death
- ☐ Survivorship Action
- ☒ Economic Loss
- ☒ Loss of Services
- ☐ Loss of Consortium

10. [Fill in if applicable] As a result of the injuries to her husband, _____, Plaintiff's Spouse, _____, suffers from a loss of consortium, including the following injuries:

- ☐ loss of marital services;
- ☐ loss of companionship, affection or society;
- ☐ loss or support; and
- ☐ monetary losses in the form of unreimbursed costs she has had to expend for the health care and personal care of her husband.

11. [Check if applicable] ☒ Plaintiff (and Plaintiff's Spouse, if applicable) reserve(s) the right to object to federal jurisdiction.

DEFENDANTS

12. Plaintiff (and Plaintiff's Spouse, if applicable) bring(s) this case against the following Defendants in this action [check all that apply]:

- ☒ National Football League
- ☒ NFL Properties, LLC
- ☒ Riddell, Inc.
- ☒ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
- ☒ Riddell Sports Group, Inc.
- ☒ Easton-Bell Sports, Inc.
- ☒ Easton-Bell Sports, LLC
- ☐ EB Sports Corporation
- ☐ RBG Holdings Corporation

13. [Check where applicable] As to each of the Riddell Defendants referenced above, the claims asserted are: _____ design defect; _____ informational defect; _____ manufacturing defect.

14. [Check where applicable] _____ Plaintiff (or decedent) wore one or more helmets designed and/or manufactured by the Riddell Defendants during one or more years Plaintiff (or decedent) played in the NFL and/or AFL.

15. Plaintiff played in [check if applicable] ☒ the National Football League ("NFL") and/or in [check if applicable] _____ American Football League ("AFL") during 1991-1997 for the following teams: Minnesota Vikings; New York Jets; Tampa Bay Buccaneers and Kansas City Chiefs.

CAUSES OF ACTION

16. Plaintiff herein adopts by reference the following Counts of the Master administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

- X Count I (Action for Declaratory Relief – Liability (Against the NFL))
- X Count II (Medical Monitoring (Against the NFL))
- _____ Count III (Wrongful Death and Survival Actions (Against the NFL))
- X Count IV (Fraudulent Concealment (Against the NFL))
- X Count V (Fraud (Against the NFL))
- X Count VI (Negligent Misrepresentation (Against the NFL))
- _____ Count VII (Negligence Pre-1968 (Against the NFL))
- _____ Count VIII (Negligence Post-1968 (Against the NFL))
- X Count IX (Negligence 1987-1993 (Against the NFL))
- X Count X (Negligence Post-1974 (Against the NFL))
- _____ Count XI (Loss of Consortium (Against the NFL))
- X Count XII (Negligent Hiring (Against the NFL))
- X Count XIII (Negligent Retention (Against the NFL))
- X Count XIV (Strict Liability for Manufacturing Defect (Against the Riddell Defendants))
- X Count XV (Strict Liability for Manufacturing Defect (Against Riddell Defendants))
- X Count XVI (Failure to Warn (Against the Riddell Defendants))

X Count XVII (Negligence (Against the Riddell Defendants))

X Count XVIII (Civil Conspiracy/Fraudulent Concealment (Against NFL Defendants))

17. Plaintiff asserts the following additional causes of action [write in or attach]:

SEE ATTACHMENT "A" TO THIS COMPLAINT

PRAYER FOR RELIEF

WHEREFORE, Plaintiff (and Plaintiff's Spouse, if applicable) pray(s) for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose laws will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of prejudgment interest and costs of suit; and
- F. An award of such other and further relief as the Court deems just and proper.

JURY DEMAND

Pursuant to Federal Rules of Civil Procedure 38, Plaintiff(s) hereby demand(s) a trial by jury.

RESPECTFULLY SUBMITTED:

WASHINGTON & ASSOCIATES, PLLC

/s/ Mickey Washington

Mickey Washington

Texas State Bar No.: 24039233

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone No.: (713) 284-5208

Facsimile No.: (713) 284-5250

Email: mw@mickeywashington.com

James Carlos Canady

Texas State Bar No.: 24034357

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

(713) 284-5204 Voice

(713) 284-5250 – FAX

Email: ccanady@canadylawfirm.com

Lance Lubel

Texas State Bar No.: 12651125

Adam Voyles

Texas State Bar No.: 24003121

5020 Montrose Blvd., Suite 800

Houston, TX 77006

Telephone No.: (713) 284-5200

Facsimile No.: (713) 284-5250

Email: adam@lubelvoyles.com

lance@lubelvoyles.com

Attorneys for Plaintiff